Filed 04/01/2008

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CYNTHIA McGRATH, INDIVIDUALLY, AND AS ADMINISTRATRIX AD PROSEQUENDUM OF THE ESTATE OF MEGAN K. WRIGHT, DECEASED, AND AS GENERAL ADMINISTRATRIX OF THE ESTATE OF MEGAN K. WRIGHT, DECEASED,

07cv11279 (SCR)(GAY) (ECF case)

Plaintiff,

- against -

DOMINICAN COLLEGE OF BLAUVELT,
NEW YORK, SISTER MARY EILEEN O'BRIEN,
INDIVIDUALLY AND AS PRESIDENT OF
DOMINICAN COLLEGE, JOHN LENNON,
INDIVIDUALLY AND AS DIRECTOR OF
SECURITY OF DOMINICAN COLLEGE, JOHN
PRESCOTT, INDIVIDUALLY AND AS DEAN OF
STUDENTS OF DOMINICAN COLLEGE, CARLYLE
HICKS, INDIVIDUALLY AND AS DIRECTOR OF
RESIDENT LIFE OF DOMINICAN COLLEGE,
RICHARD FEGINS, JR., KENNETH A. THORNE, JR.,
ISAIAH LYNCH, and TERRELL E. HILL,

MOTION TO ADMIT COUNSEL PRO HAC VICE

S.D. OF N.Y. W.P.

Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York, I, Andrew L. Morrison, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name:

Gloria Allred

Firm Name:

Allred, Maroko & Goldberg

Address:

6300 Wilshire Blvd., Suite 1500

City/State/Zip:

Los Angeles, CA 90048

Telephone:

(323) 653-6530

Fax:

(323) 653-1660

Email Address:

GAllred@amglaw.com

Gloria Allred is a member in good standing of the Bar of the State of California. There are no pending disciplinary proceedings against Gloria Allred in any State or Federal court.

Dated: March 31, 2008 New York, New York

Respectfully submitted,

Andrew L. Morrison

SDNY Bar Code: AM-1071 Kirkpatrick & Lockhart Preston

Gates Ellis LLP

599 Lexington Avenue

New York, NY 10022-6030

Tel.: (212) 536-3941 Fax: (212) 536-3901

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	Y
CYNTHIA McGRATH, INDIVIDUALLY, AND AS ADMINISTRATRIX AD PROSEQUENDUM OF THE ESTATE OF MEGAN K. WRIGHT, DECEASED, AND AS GENERAL ADMINISTRATRIX OF THE ESTATE OF MEGAN K. WRIGHT, DECEASED,	X : : 07cv11279 (SCR) (GAY) (ECF Case)
Plaintiff,	:
- against —	: AFFIDAVIT OF ANDREW L. MORRISON : IN SUPPORT OF MOTIO
DOMINICAN COLLEGE OF BLAUVELT, NEW YORK, SISTER MARY EILEEN O'BRIEN, INDIVIDUALLY AND AS PRESIDENT OF	TO ADMIT COUNSEL PRO HAC VICE
DOMINICAN COLLEGE, JOHN LENNON, INDIVIDUALLY AND AS DIRECTOR OF SECURITY OF DOMINICAN COLLEGE, JOHN PRESCOTT DIRECTOR DEPARTMENT AND AS DEAN OF	:
PRESCOTT, INDIVIDUALLY AND AS DEAN OF STUDENTS OF DOMINICAN COLLEGE, CARLYLE HICKS, INDIVIDUALLY AND AS DIRECTOR OF RESIDENT LIFE OF DOMINICAN COLLEGE,	: :
RICHARD FEGINS, JR., KENNETH A. THORNE, JR., ISAIAH LYNCH, and TERRELL E. HILL,	:
Defendants.	:
State of New York)	X
) ss:	
County of New York)	

Andrew L. Morrison, being duly sworn, hereby deposes and says as follows:

1. I am a Partner at Kirkpatrick & Lockhart Preston Gates Ellis LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Gloria Allred as counsel pro hac vice to represent Plaintiff in this matter.

Filed 04/01/2008

- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in January of 1988. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
 - 3. I have known Gloria Allred since December 2007.
- Gloria Allred is a Partner at Allred, Maroko & Goldberg in Los Angeles, 4. California.
- 5. I have found Gloria Allred to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- 6. Accordingly, I am pleased to move the admission of Gloria Allred, pro hac vice.
- I respectfully submit a proposed order granting the admission of Gloria 7. Allred, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Gloria Allred, pro

hac vice, to represent Plaintiff in the above captioned matter, be granted.

New York, New York Dated: March 31, 2008

Respectfully submitted,

Andrew L. Morrison

SDNY Bar Code: AM-1071 Kirkpatrick & Lockhart Preston

Gates Ellis LLP

599 Lexington Avenue

New York, NY 10022-6030

Tel.: (212) 536-3941 Fax: (212) 536-3901

Sworn to before me this 31st day of March 2008

V

DEBORAH JEAN CERIA MEYERS
Notary Public, State of New York
No. 31-4831744
Qualified in New York County
Commission Expires September 30, 200

180 HOWARD STREET SAN FRANCISCO, CALIFORNIA 94105-1639 TELEPHONE (415) 538-2000

March 14, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, GLORIA RACHEL ALLRED, #65033 was admitted to the practice of law in this state by the Supreme Court of California on December 18, 1975; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert

Custodian of Membership Records

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CYNTHIA McGRATH, INDIVIDUALLY, AND AS ADMINISTRATRIX AD PROSEQUENDUM OF THE ESTATE OF MEGAN K. WRIGHT, DECEASED, AND AS GENERAL ADMINISTRATRIX OF THE ESTATE

OF MEGAN K. WRIGHT, DECEASED,

07cv11279 (SCR)(GAY) (ECF Case)

Plaintiff,

- against -

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

DOMINICAN COLLEGE OF BLAUVELT, NEW YORK, SISTER MARY EILEEN O'BRIEN, INDIVIDUALLY AND AS PRESIDENT OF DOMINICAN COLLEGE, JOHN LENNON, INDIVIDUALLY AND AS DIRECTOR OF SECURITY OF DOMINICAN COLLEGE, JOHN PRESCOTT, INDIVIDUALLY AND AS DEAN OF STUDENTS OF DOMINICAN COLLEGE, CARLYLE HICKS, INDIVIDUALLY AND AS DIRECTOR OF RESIDENT LIFE OF DOMINICAN COLLEGE, RICHARD FEGINS, JR., KENNETH A. THORNE, JR., ISAIAH LYNCH, and TERRELL E. HILL,

Defendants.

....X

Upon the motion of Andrew L. Morrison, attorney for Plaintiff and said sponsor

attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:

Gloria Allred

Firm Name:

Allred, Maroko & Goldberg

Address:

6300 Wilshire Blvd., Suite 1500

City/State/Zip:

Los Angeles, CA 90048

Telephone/Fax:

(323) 653-6530/(323) 653-1660

Email Address:

GAllred@amglaw.com

is admitted to practice pro hac vice as counsel for Plaintiff in the above captioned case in the

United States District Court for the Southern District of New York. All attorneys appearing

before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated	:
C:4/5	١.

City/State:

Stephen C. Robinson, U.S. District Judge

Andrew L. Morrison (AM-1071) Sarah P. Kenney (SK-5642) KIRKPATRICK & LOCKHART PRESTON GATES ELLIS LLP 599 Lexington Avenue New York, New York 10022 212-536-3900 Attorneys for Plaintiff Cynthia McGrath, individually and as Administratrix Ad Prosequendum of the Estate of Megan Wright, Deceased, and as General Administratrix of the Estate of Megan K. Wright Deceased

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

----X CYNTHIA McGRATH, INDIVIDUALLY AND AS ADMINISTRATRIX AD PROSEQUENDUM OF THE ESTATE OF MEGAN K. WRIGHT, DECEASED, AND AS GENERAL ADMINISTRATRIX OF THE ESTATE OF MEGAN K. WRIGHT, DECEASED,

07 Civ. 11279 (SCR)(GAY)

Plaintiff,

- against -

DOMINICAN COLLEGE OF BLAUVELT, NEW YORK, SISTER MARY EILEEN O'BRIEN, INDIVIDUALLY AND AS PRESIDENT OF DOMINICAN COLLEGE, JOHN LENNON, INDIVIDUALLY AND AS DIRECTOR OF SECURITY OF DOMINICAN COLLEGE, JOHN PRESCOTT, INDIVIDUALLY AND AS DEAN OF STUDENTS OF DOMINICAN COLLEGE, CARLYLE HICKS, INDIVIDUALLY AND AS DIRECTOR OF RESIDENT LIFE OF DOMINICAN COLLEGE, RICHARD FEGINS, JR., KENNETH A. THORNE, JR., ISAIAH LYNCH, and TERRELL E. HILL,

CERTIFICATE OF **SERVICE**

Defendants.

I, Sarah P. Kenney, hereby certify that on April 1, 2008, I caused the Motion to Admit Counsel Pro Hac Vice and Affidavit of Andrew L. Morrison In Support Of Motion To Admit

Counsel Pro Hac Vice, exhibit thereto, and Certificate of Good Standing of Gloria Allred, to be served by first class mail, postage prepaid, addressed as follows:

> Philip C. Semprevivo, Jr., Esq. Biedermann, Reif, Hoenig & Ruff 570 Lexington Avenue New York, New York 10022 Attorneys for Defendants Dominican College of Blauvelt, New York, Sister Mary Ellen O'Brien, John Lennon, John Prescott and Carlyle Hicks

Kenneth J. Murphy, Esq. Samimi & Murphy 616 South Main Street New City, New York 10956 Attorneys for Defendant Richard Fegins

Richard Willstatter, Esq. Green & Willstatter 200 Mamaroneck Avenue Suite 605 White Plains, New York 10601 Attorneys for Defendant Kenneth Thorne, Jr.

Karen Campbell, Esq. Alan Kaminsky, Esq. Lewis Brisbois Bisgaard & Smith LLP 199 Water Street **Suite 2500** New York, New York 10038 Attorneys for Defendant Isaiah Lynch

Terrell Hill 32 Halgren Cres. Haverstraw, New York 10927-1032 Defendant